

3:24-mj-00021

DISTRICT OF OREGON, ss: **SEALED** AFFIDAVIT OF GRANT TAYLOR

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Grant Taylor, being first duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation and have been employed with the FBI since June of 2021. Since becoming a Special Agent, I have received specialized training from the FBI, to include completing the 21-week New Agent Training course at the FBI Academy in Quantico, Virginia. I am currently assigned to the Seattle Field Division at the Vancouver office where I am a member of the Safe Streets Task Force. In this capacity, I investigate, inter alia, organized crime, drug trafficking, firearms offenses, and related violations. Based upon my training and experience, I am familiar with the key role that firearms play in the commission of crimes in support of gang objectives. In my role as a Special Agent for the FBI, I have participated in many aspects of investigations, including conducting physical surveillance, managing confidential sources, interviewing witnesses, conducting controlled buys of illicit narcotics, and executing search warrants. I am an investigative law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). As such, I am empowered to conduct investigations of, and to make arrests for, violations enumerated in Title 18, United States Code, Section 2516.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Tre'vell Carcell RICH (date of birth xx/xx/1999), for violations of 18 U.S.C. § 875(c). As set forth below, there is probable cause to believe, and I do believe, that RICH committed the crime of Interstate Communication of Threats.

3. The facts set forth in this Affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation,

including other law enforcement personnel; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause to believe that the defendant committed the crimes set forth herein, this document does not contain all of my knowledge of the larger investigation.

Applicable Law

4. Title 18, U.S.C. § 875(c) makes it a felony crime to transmit in interstate or foreign commerce, including by computer, any communication containing any threat to injure the person of another.

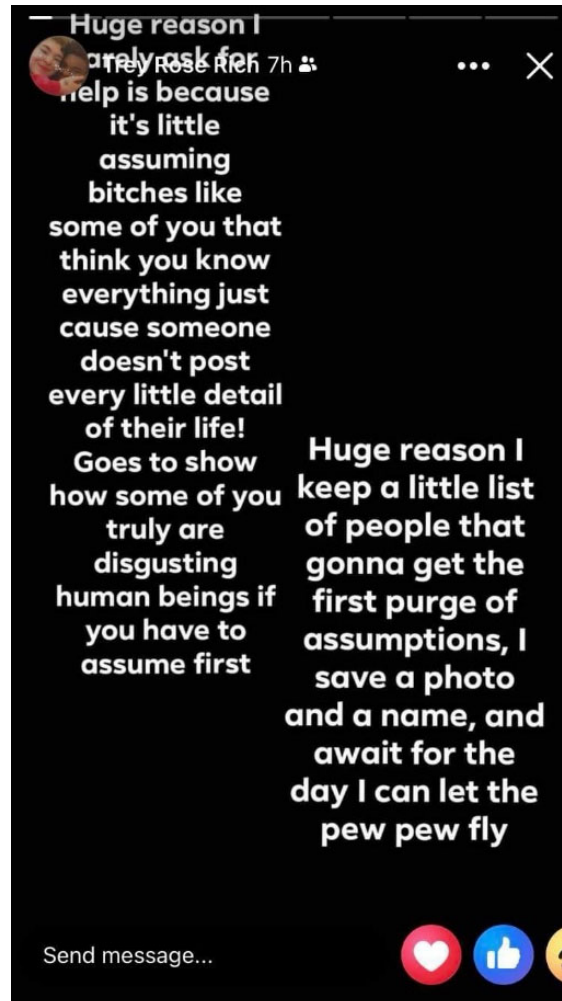
Probable Cause Statement

5. On February 11, 2024, agents interviewed Adult Witness-1 (AW-1). AW-1 had reported that RICH was posting threats on his Instagram. AW-1 stated that in August of 2023, while AW-1 and RICH were in the process of divorce, RICH drew a knife and pointed it at AW-1 during an argument. RICH said that he was going to kill himself, but he pointed the knife at AW-1 and came within about two feet of AW-1. AW-1 applied for a protection order, which was granted and served on October 31, 2023.

6. On February 10, 2024, AW-1 received screenshots of RICH's Instagram stories from mutual friends who knew both RICH and AW-1. These friends said they saw the stories and were concerned about RICH's mental state. These screenshots contain a number of threats to a number of people, including AW-1. The screenshots show the profile name "Trey Rose Rich" and show a picture of what appears to be RICH's face along with his reported girlfriend.

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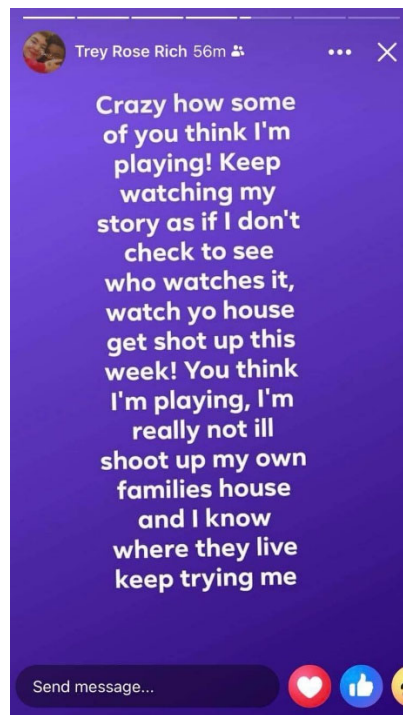
7. In the first story RICH posted on February 10, 2024, RICH writes “Huge reason I keep a little list of people that gonna get the first purge of assumptions, I save a photo and a name, and await for the day I can let the pew pew fly.” Based on my training and experience, I know that “pew pew” is slang for bullets. RICH is therefore saying that he keeps a list of people that he wants to shoot. The screenshot is included below.



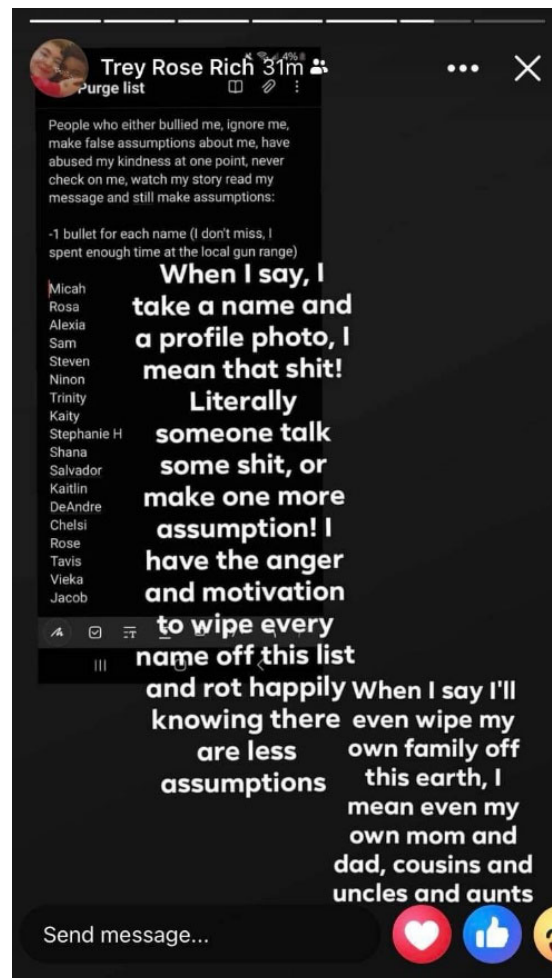
8. In the second story RICH posted on February 10, 2024, RICH wrote, “It’s 2024 and I’m not playing wit nobody, if I reach out for help, advice, or anything and you wanna be rude, assume, talk some shit, I would highly advise you think before you do so because my breaking point of shooting up yo house and block is close.”



9. In another story RICH posted on February 10, 2024, RICH posted, “You think I’m playing, I’m really not ill shoot up my own families house and I know where they live keep trying me.” A picture of the screenshot is posted below.



10. In another story RICH posted on February 10, 2024, RICH posted a picture of what appears to be a note on his phone with the caption “Purge list.” Above the list, RICH wrote “1 bullet for each name (I don’t miss, I spent enough time at the local gun range).” The list includes 27 names, including AW-1’s first name. The list also includes the first names of AW-2 and AW-3. AW-2 and AW-3 are two friends of AW-1 who she turned to during her divorce from RICH. In the story, RICH writes, “When I say, I take a name and a profile photo, I mean that shit! Literally someone talk some shit, or make one more assumption! I have the anger and motivation to wipe every name off this list and rot happily knowing there are less assumptions. When I say I’ll even wipe my own family off this earth, I mean even my own mom and dad, cousins and uncles and aunts.”



11. Based on my training and experience, I believe these are credible threats. RICH specifically mentions names of people that he believes have hurt him. He states specifically that he has the capability and the will to kill these people. Furthermore, he posted his threats on a public forum in such a manner as to ensure that it was viewed as a threat.

Conclusion

12. Based on the foregoing, I have probable cause to believe, and I do believe, that Tre'vell Carcell RICH communicated threats of violence toward AW-1 and others via Instagram and as such has committed the crime of Interstate Communication of Threats, in violation of 18 U.S.C. § 875(c). I therefore request that the Court issue a criminal complaint and arrest warrant for Tre'vell Carcell RICH.

13. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney ("AUSA") Meredith Bateman, and AUSA Bateman advised me that in her opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

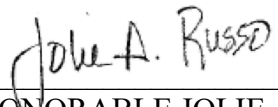
14. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise

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seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by Telephone
In accordance with Fed R. Crim. P. 4.1
GRANT TAYLOR
Special Agent, FBI

Sworn in accordance with requirements of Fed. R. Crim. P. 4.1 by telephone at 2:11
p.m. on February 12, 2024.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge